

MEMO ENDORSED

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VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Crumwell v. Bay Harbor Motors Corp.*,
Case No.: 1:22-cv-1825

Dear Judge Caproni,

The undersigned represents Denise Crumwell, on behalf of herself and all other persons similarly situated (“Plaintiff”), in the above-referenced action against Bay Harbor Motors Corp., (“Defendant”). The undersigned respectfully requests that the Initial Conference scheduled for July 15, 2022, at 10:00 AM (Dkt. 6) be adjourned for 60 days because Counsel for the Defendant has not yet answered or appeared in this Action. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an additional 45 days to respond to the Complaint until August 11, 2022, so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for the Defendant to retain counsel and for Defendant’s Counsel to appear and discuss a possible resolution with Plaintiff’s Counsel. This is the Plaintiff’s first request for an extension

We thank the Court for its time and attention in this matter.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

Application DENIED. The Initial Pre-Trial Conference currently scheduled for July 15, 2022, at 10:00 a.m. is hereby CANCELED. If Defendant does not move or answer by July 15, 2022, Plaintiff must apply for a certificate of default not later than **July 29, 2022**, and must move for default judgment not later than two weeks after the certificate of default is issued.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the date "6/27/22".

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE